

EPA Registration # 74468-5

Volume 1



U.S. ENVIRONMENTAL PROTECTION
AGENCY

Office of Pesticide Programs
Registration Division (7505P)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

EPA Reg. Number:

83278-1

Date of Issuance:

JAN 4 2007

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance: **Conditional**

Name of Pesticide Product:

Prodiamine Technical

Name and Address of Registrant (include ZIP Code):

Envanage, LLC
115 Obtuse Hill Road
Brookfield, CT 06804

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) and (B) provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data.
2. Submit within one year of the date of this registration notice, storage stability (830.6317) and corrosion characteristics (830.6320) studies.

Signature of Approving Official:

Joanne I. Miller
Product Manager 23
Herbicide Branch
Registration Division (7505P)

Date:

JAN 4 2007

3. Make the following label changes:
 - a. Please be sure to review numbers 2 and 4 under **Comments and Recommendations** from the Technical Review Branch Similarity Clinic Determination that is included in this package.
 - b. Under Hazards to Humans and Domestic Animals, add "Causes moderate eye irritation. [Wear protective eyewear.]"
 - c. Under the Storage and Disposal section, the first bullet must read "**Pesticide Storage:**"
 - d. Revise the EPA Registration Number to read, "EPA Reg. No. **83278-1**."
4. Submit one copy of the revised final printed label for the record before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

ACCEPTED
with COMMENTS
In EPA Letter Dated:

JAN 4 2007

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

Prodiamine Technical

For the Manufacture of
Non-Food Use Granular Herbicides Only

83278-1

Active Ingredient:

Prodiamine (CAS No. 2909-21-2).....97.5%
Related Compounds:.....2.5%
TOTAL.....100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

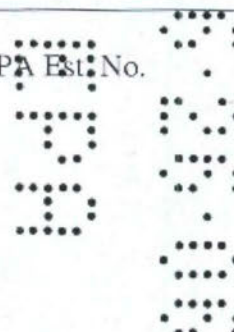
FIRST AID	
If Swallowed:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on Skin or Clothing:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If in Eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
If Inhaled:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

EPA Reg. No. 83278-XXX

Net Contents:

Manufactured by:
Envanage LLC
115 Obtuse Hill Road
Brookfield, CT 06804

EPA Est. No.



PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing dust. Avoid contact with skin, eyes, or clothing.

ENVIRONMENTAL HAZARDS

This product has a low solubility in water. At the limit of solubility, this product is not toxic to fish. However, at concentrations above the level of water solubility, it may be toxic to fish.

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is to be used ONLY FOR FORMULATION INTO GRANULAR HERBICIDES for the following use(s):

1. Established turfgrasses, lawns and sod nurseries;
2. Landscape ornamentals in nurseries or in established plantings;
3. Established perennials and wildflower plantings;
4. Plants grown for cut foliage production;
5. Conifer and hardwood tree seedling nurseries;
6. Christmas tree farms;
7. Managed transportation and utility rights-of-way, including rail and equipment yards, and public utility facilities (substations, tank farms, pumping stations, parking/storage areas, ungrazed fencerows).

This product is a technical active ingredient intended to be used only in the manufacture of registered non-crop end-use products. Each formulator is responsible for obtaining the EPA registration for their formula(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in original container away from fertilizer, feed, or food stuffs and separate from other pesticides.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of at an approved waste disposal facility.

Container Disposal: Plastic Containers – Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or at an incineration facility, or, if allowed by state and local authorities, by burning locally. If burned, stay out of smoke.

Paper and Plastic Containers – Completely empty container into application equipment. Then dispose of empty container in a sanitary landfill or at an incineration facility. Completely empty

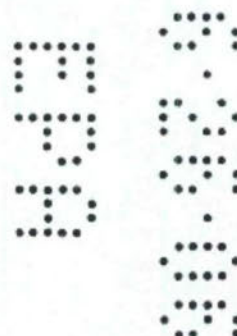
container into formulation equipment. Then dispose of empty container in a sanitary landfill or, if allowed by state and local authorities, by burning locally. If burned, stay out of smoke.

Fiber Drums – Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residues into application equipment. Dispose of empty liner in a sanitary landfill or at an incineration facility if allowed by state and local authorities. If the drum cannot be reused, dispose of in a sanitary landfill or by incineration if allowed by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

ENVANAGE, LLC warrants that this product conforms to the chemical description and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or ENVANAGE, and Buyer and User assume the risk of any such use. ENVANAGE, LLC MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

In no case shall ENVANAGE, LLC be liable for incidental, consequential, or special damages resulting from the use or handling of this product. The exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.



FEE

BARCODE: D330723; **Reg. No. :** 83278-R **PRODUCT:** Prodiamine Technical TGAI/MUP

Date: December 19, 2006

SUBJECT: Product Chemistry Review of Prodiamine Technical TGAI/MUP

FROM: Shyam B. Mathur, PhD
Product Chemistry Team Leader
Technical Review Branch/RD (7505C)

S. B. Mathur
12-19-06
Dme

TO: Eugene Wilson / Joanne Miller, RM 23
Herbicide Branch / RD (7505C)

DP BARCODE: D330723
DECISION No.: 368676
File Symbol No.: 83278-R
PRODUCT: Prodiamine Technical TGAI/MUP
PCC: 110201
REGISTRANT: Envanage LLC
USE: Herbicide, Non-food use

INTRODUCTION:

The registrant, Envanage LLC, has submitted the product chemistry data to support the registration of the proposed TGAI/MUP Prodiamine technical produced by [REDACTED]. The registrant has submitted the product chemistry data corresponding to 830 series Subgroup A and subgroup B for the proposed prodiamine technical. Based on the five batch analytical data, the registrant has provided the CSF for basic formulation (dated 06-23-06). The product chemistry data submitted have been assigned MRID Nos. 468721-01 & 468721-02. The registrant has claimed that the proposed prodiamine technical is substantially similar to the registered technical prodiamine (SAN745) with Reg. No. 100-833. TRB has been asked to evaluate the product chemistry data submitted for prodiamine technical and determine its similarity to the registered technical prodiamine.

SUMMARY OF FINDINGS:

1. The registrant has submitted a Confidential Statement of Formula for basic formulation (dated 06-23-06) for the prodiamine technical TGAI / MUP. The average purity of the technical/MUP as determined by five batch analysis is 97.5%. The proposed certified limits for the AI are based on the standard certified limits set-forth in 40CFR§158.175(b)(2) and the certified limits for the impurities are calculated based on the five batch analysis. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR§158.155 and 158.175 respectively [MRID No. 468721-01].

2. The product chemistry data submitted corresponding to guideline reference 830.1600 (description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.160 [MRID No. 468721-01].

Product ingredient source information may be entitled to confidential treatment

BARCODE: D330723; **Reg. No. :** 83278-R **PRODUCT:** ProdiamineTechnical TGA/MUP

3. The product chemistry data submitted corresponding to guideline reference 830.1620 (description of production process) satisfy the data requirements for 40CFR§158.162. The prodiamine technical was manufactured at site located in [REDACTED] in seven step batch-wise integrated process followed by [REDACTED] the finished product. The details of the production process have been provided [MRID No. 468721-01].

4. The product chemistry data submitted corresponding to guideline reference 830.1670 (discussion on the formation of impurities) satisfy the data requirements for 40CFR§158.167. The synthetic pathway used to produce of prodiamine technical by [REDACTED] may result in the formation of [REDACTED] impurities. As per the proposed basic CSF, there is only [REDACTED] impurity present at concentrations of $\geq 0.1\%$. Remaining of the [REDACTED] impurities which are listed in the CSF are shown to be present at concentrations of $\leq 0.1\%$. These impurities may occur as un-reacted starting materials or as theoretical reactions that could occur, provided the other components present in the process. Based on theory, one toxicological significant impurity [REDACTED] on the CSF) can be formed; however, according to the registrant this impurity was not detected with the LOQ of 0.05 ppm [MRID No. 468721-01].

5. The data submitted corresponding the guideline reference 830.1700 (preliminary analysis) satisfy the data requirements of 40CFR§158.170. The study was conducted under GLP requirements in compliance with 40CFR§160. Five representative batches of the prodiamine technical were assayed to determine percent active ingredient and corresponding impurities associated with the production of this herbicide. The HPLC with UV detection was utilized to determine percent AI and [REDACTED] impurities. The GC with mass selective (GC/MS) was used to determine the concentration of [REDACTED]. The active ingredient content of the test substance ranged from 96.52% to 98.62%. The [REDACTED] was not detected in any of the batches [MRID No. 468721-02].

6. The data submitted corresponding the guideline reference 830.1800 (enforcement analytical method) satisfy the data requirements of 40CFR§158.180. The active ingredient prodiamine in the technical prodiamine was determined by HPLC/UV (254 nm) method. The analytical method was based on HPLC employing an external standard technique with UV detection (254 nm). The method was validated for precision, accuracy and linearity [MRID No. 468721-02].

7. The data submitted corresponding to guideline 830 Series Subgroup B (physical-chemical properties) for the prodiamine technical satisfy the data requirements of 40CFR§158.190, except for one year storage stability (830.6317) and corrosion characteristics (830.6320) [MRID No. 468721-02].

CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for prodiamine technical TGA / MUP and has concluded that:

1. All the product chemistry data submitted corresponding to 830 Series Subgroup A and Subgroup B are acceptable, except for one year storage stability (830.6317) and corrosion characteristics (830.6320).
2. The CSF for basic formulation (dated 06-23-06) is acceptable.
3. The registrant must conduct and submit the results for one year storage stability (830.6317) and corrosion characteristics (830.6320) studies. It is recommended that the observations must be made at 0, 3, 6, 9, & 12 months intervals. The results must be submitted in electronic copy also along with hard copy.

The proposed prodiamine technical (File symbol No. 83278-R) was determined to be substantially similar to the registered prodiamne technical (SAN745) with Reg. No. 100.833 from product chemistry view point. The proposed technical have fewer impurities as compared to registered product and would not significantly increase the risk of unreasonable adverse effects on the environment.

BARCODE: D330723; **Reg. No. :** 83278-R **PRODUCT:** Prodiamine Technical TGA/MUP

830.1550. Product identity & Composition: (MRID No. 468721-01)

Common Name: Prodiamine technical

Chemical Name: CAS: 2, 4-dinitro-N³, N³-dipropyl-6-(trifluoromethyl)-1, 3-benzenediamine or
2-amino-4-di(n-propyl)amino-3, 5-dinitrobenzotrifluoride

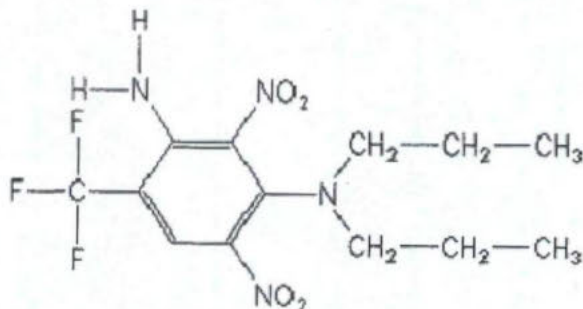
CAS No.: 29091-21-2

PC Code No.: 110201

Empirical formula: C₁₃H₁₇F₃N₄O₄

Molecular Weight: 350.3

Structural formula:



BARCODE: D330723; Reg. No. : 83278-R PRODUCT: ProdiamineTechnical TGA/MUP

Table 1. Manufacturing and Impurity Data for Prodiamine technical				
GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	Basic CSF (06-23-06)	A	The NC of AI (97.5%) is supported by 5 batch analysis of the samples from the production site in [REDACTED] agrees with the label claim NC.
830.1600	Description of materials used to produce the product	468721-01	A	The MSDS specifications for all starting material used for the synthesis of prodiamine technical have been provided by the registrant.
830.1620	Description of production process	468721-01	A	The production of prodiamine technical is a batch process with seven reaction steps. The process has been described in full details. The reaction conditions, amounts of chemicals in each step, duration of time, and the yields in each step have been provided. The QA steps involved in each step have been described.
830.1670	Discussion of formation of impurities	468721-01	A	The applicant has provided the discussion on the formation of all the impurities formed and the potential impurities which may be formed based on theoretical consideration. The registrant has listed [REDACTED] impurity present at the levels of $\geq 0.1\%$ and other [REDACTED] impurities at concentrations of $\leq 0.1\%$. The registration has discussed the possibility of the formation of [REDACTED] but was not detected during five batch analysis at LOQ of 0.05 ppm.
830.1700	Preliminary analysis	468721-02	A	The registrant has provided 5 batch analysis for the TGA produced at [REDACTED] site by HPLC/UV (254 nm) for the determination and quantification of the AI & impurities. The [REDACTED] was determined by GC-MS method. The five batch analysis supported the CSF for basic formulation.
830.1750	Certified limits	468721-02	A	The proposed certified limits for the AI are calculated based on standard certified limits. For the impurities, the proposed certified limits are based on the five batch analytical results.
830.1800	Enforcement analytical method	468721-02	A	The AI was assayed by using HPLC/UV (254 nm) method.
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

Product ingredient source information may be entitled to confidential treatment

Manufacturing process information may be entitled to confidential treatment

BARCODE: D330723; Reg. No. : 83278-R PRODUCT: Prodiamine Technical TGA/MUP

830 Series Subgroup B (Physical-Chemical Properties)

Table 2: Physical and Chemical Properties of : Prodiamine TGA/MUP				
GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	468721-02	A	Yellow
830.6303	Physical state	* " *	A	Solid (powder)
830.6304	Odor	" * "	A	Odorless
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	* " *	A	Stable at normal & elevated temperatures (54°C for 2 weeks). Stable to iron & Al metal and corresponding acetate salts.
830.6314	Oxidation/reduction: chemical incompatibility	* " *	A	No reaction when placed in contact with water, mono-ammonium phosphate, powdered iron or ferric chloride
830.6315	Flammability		NA	
830.6316	Explodability		NA	
830.6317	Storage stability		G	
830.6319	Miscibility		NA	
830.6320	Corrosion characteristics		G	
830.7000	pH	468721-02	A	8.80 at 25°C (1% aqueous solution)
830.7050	UV/Visible absorption	468721-02	A	Note 1
830.7100	Viscosity		NA	
830.7200	Melting point	468721-02	A	126.5°C
830.7220	Boiling point		NA	
830.7300	Relative Density	468721-02	A	Pour=0.66 g/ml; Tap=0.897 g/ml at 20°C
830.7370	Dissociation constants in water (DC)	Data Matrix Notes		The test substance does not dissociate because of very low solubility in water
830.7550	Partition coefficient	468721-02	A	Log Ko/w = 4.18 at @ 25°C
830.7840	Water solubility	468721-02	A	Purified water = 0.015 mg/L at 25°C; acetone=21.90 g/100ml; xylene=3.86 g/100 ml; n-octanol=0.83 g/100ml
830.7950	Vapor pressure	Data Matrix Notes		Literature indicates that the VP is below any of the guideline test methods and is not possible to determine an accurate reading.

A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Upgrade (additional information required)

BARCODE: D330723; **Reg. No. :** 83278-R **PRODUCT:** ProdiamineTechnical TGAI/MUP

Note1. 830.7050. UV-Vis:

Two absorbance maxima were observed. The first maximum at 216 nm was observed in the methanol and acidified methanol solutions but could not be resolved in basic solution spectrum. The other maximum occurred at 277 nm for all three solutions. The extinction coefficients were 22673 and 19593 for the neutral and acidic solutions, respectively, at 216 nm. The extinction coefficients were 16394, 13385, and 15156 for the neutral, acidic, and basic solutions, respectively, at 277 nm. The bandwidth for the 277 nm absorbance maximum was approximately 25 nm for each solution. A bandwidth could not be estimated for the 216 nm maximum due to poor resolution.

830.1800. Enforcement analytical method: (MRID No. 468756-01)

The active ingredient in the prodiamine TGAI/MUP was assayed by HPLC method. The analytical method is based on HPLC employing an external standard technique with UV detector (254 nm)

Equipment & Parameters

HPLC: Shimadzu HPLC system equipped with SCL-10 Avp System control, 2LC-10 Avp Pumps, SPD-10 Avp UV-Vis detector, SIL-10AF Auto Injector, DGU-14A Degasser.

Column: Phenomenex Inertsil 5 ODS-2, 250 x 4.6 mm, 5 µm

Mobile phase: Solvent A = Acetonitrile; Solvent B = Deionized water

Solvent Program:

Time (minutes)	% (A)	%(B)
0.1	80.0	20.0
15.0	80.0	20.0

Flow rate: 1.2 ml/minutes

Column temperature: 30°C

Injection volume: 10 µL

Detector: UV operating at 254 nm



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

TECHNICAL REVIEW BRANCH
SIMILARITY CLINIC DETERMINATION

22 November 2006

MEMORANDUM

Subject: Name of Pesticide Product: PRODIAMINE TECHNICAL
EPA Reg. No. /File Symbol: 83278-R
DP Barcode: D330724
Decision No.: 368676
PC Code: 110201 (Prodiamine: 1,3-Benzenediamine, 2,6-dinitro-N1,N1-dipropyl-4-(trifluoromethyl)-*m*-phenylenediamine: 97.5%)

From: Byron T. Backus Ph.D., Toxicologist
Technical Review Branch
Registration Division (7505P)

Byron T. Backus
11/22/2006
[Signature]

To: Eugene Wilson/Joanne Miller, RM Team 23
Herbicide Branch
Registration Division (7505P)

Registrant: EVANAGE, LLC

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
110201 Prodiamine	97.5%
<u>Other Ingredient(s):</u>	<u>2.5%</u>
Total:	100.0%

ACTION REQUESTED: The Risk Manager requests:

"Please review this me-too application to register a new technical prodiamine product..."

BACKGROUND:

According to the Application for Pesticide Registration, the registrant has stated their product, EPA File Symbol 83278-R, is similar in composition and labelling to EPA Reg. No. 100-833. According to the attached letter dated June 23, 2006, this application is supported by the cite-all option.

COMMENTS AND RECOMMENDATIONS:

1. TRB has compared the CSF of 83278-R with that of 100-833. After this comparison, TRB concludes that 83278-R is toxicologically substantially similar in terms of systemic toxicity to EPA Reg. No. 100-833.
2. There is some uncertainty regarding the eye irritation potential of the 83278-R. The precautionary labeling of the cited product (EPA Reg. No. 100-833) indicates it is in EPA Toxicity Category IV for eye irritation. However, since particle sizes and/or morphologies may be factors in eye irritation potential, TRB recommends that 83278-R be assigned to EPA Toxicity Category III by this exposure route. If the registrant wishes to demonstrate their product is in Toxicity Category IV for eye irritation, then a primary eye irritation study (870.2400) should be submitted to the Agency.
3. The acute toxicity data requirements for the registration of 83278-R can be satisfied on the basis of similarity to EPA Reg. No. 100-833, the cite-all method of support, and assignment of this formulation to Toxicity Category III for eye irritation.
4. Based on the precautionary labeling of the currently registered (cited) product, EPA Reg. No. 100-833, the following is the acute toxicity profile for EPA File Symbol 83278-R:

Acute Oral LD ₅₀	Toxicity Category III	Similarity (100-833)
Acute Dermal LD ₅₀	Toxicity Category III	Similarity (100-833)
Acute Inhalation LC ₅₀	Toxicity Category III	Similarity (100-833)
Primary Eye Irritation	Toxicity Category III*	Similarity (100-833)
Primary Dermal Irrit.	Toxicity Category III	Similarity (100-833)
Dermal Sensitization	Negative	Similarity (100-833)

*While the precautionary labeling of 100-833 indicates Toxicity Category IV for eye irritation, particle sizes and/or morphologies may be factors in eye irritation potential, and TRB recommends assignment to Toxicity Category III by this exposure route in lieu of an actual eye irritation study demonstrating otherwise.

5. Based on the acute toxicity profile above, as well as information in the CSF, the following are the precautionary and first aid statements for EPA File Symbol 83278-R, as obtained from the Label Review System:

PRODUCT ID #: 083278-00001

PRODUCT NAME: PRODIAMINE TECHNICAL

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if swallowed, inhaled or absorbed through skin. Causes moderate eye irritation. [Wear protective eyewear.]* Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

*[Protective eyewear, which may include goggles, face shield and/or safety glasses, may be specified, if appropriate]

First Aid:

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If inhaled:

- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Note to PM/CRM/Registrant: The proposed label should contain a "Note to Physician". The following statements are suggested types of information that may be included, if applicable: - technical information on symptomatology; - use of supportive treatments to maintain life functions; - medicine that will counteract the specific physiological effects of the pesticide; - company telephone number to specific medical personnel who can provide specialized medical advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

6. This memorandum pertains only to the decision concerning whether the subject product is substantially similar to the cited product with respect to acute toxicity. For the purposes of this action, TRB has made no determination as to the adequacy of the acute toxicological data base or the precautionary statements for the cited product. In addition, for the purposes of registration, the CSF for the proposed product may have to be reviewed and accepted by the TRB Chemistry Team.

**Fees For Service Screen
83278-R**

The Administrative Paperwork is not complete. The Certification with Respect to Citation of Data, EPA Form 8570-34, must be submitted. This product does not qualify for the formulator's exemption for their source of active ingredient; a new unregistered source of active ingredient.

This submission is complete enough to start review of the product chemistry data and route to the Acute Toxicity Similarity Clinic to determine if substantially similar to the cited me-too product 100-833.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 29, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-368676
EPA File Symbol or Registration Number: 83278-R
Product Name: PRODIAMINE TECHNICAL
EPA Receipt Date: 26-Jun-2006
EPA Company Number: 83278
Company Name: EVANAGE, LLC

LAWRENCE A. MILLER
EVANAGE, LLC
115 OBTUSE HILL ROAD
BROOKFIELD, CT 06804-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R31

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

Please remit payment in the amount of: \$ 4,200 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

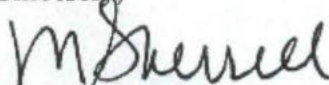
By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,



Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

MS
{795842<~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☒ Studies? ☐ Fee Waiver?
☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 23

Receipt No.

S-

795842

EPA File Symbol/Reg. No.

83278-R

Pin-Punch Date:

6/26/2006

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R31

Granted:

R31

Amount Due: \$ 4,200

Parent/Child Decisions:

Reviewer:

Date: 6/28/06 -

Remarks:



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 832786 000 R	2. EPA Product Manager Joanne Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Prodiamine Technical	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Envanage, LLC 115 Obtuse Hill Road Brookfield, CT 06804 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 100-833 Product Name Prodiamine Technical Herbicide	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application for a new pesticide product will fall within the category on Table 4 - Registration Division: New Products as published in the June 2, 2005 Federal Register. This product is further defined under EPA No. R31; CR No. 86 as a "New Product", "Non-Fast Track." Envanage, LLC is submitting product chemistry and using the cite-all option of support for any data that may be applicable to this registration action. The PRIA fee for this application is \$4,200.

Lawrence A. Miller; Fax: (203) 740-1200; Email: lmiller@biologicconsulting.com

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container		<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) fibreboard	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 25 kg.	5. Location of Label Directions <input checked="" type="checkbox"/> on label		
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Lawrence A. Miller	Title Member	Telephone No. (Include Area Code) 203-740-1200	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped) 	
2. Signature 	3. Title Member		
4. Typed Name Lawrence A. Miller	5. Date June 23, 2006		

34

ENVANAGE, LLC

115 Obtuse Hill Road
 Brookfield, CT 06804
 Voice: 203-740-1600
 Fax: 203-740-1220

June 23, 2006

Document Processing Desk
 Office of Pesticide Programs (7504C)
 US Environmental Protection Agency
 Ariel Rios Building
 1200 Pennsylvania Avenue, NW
 Washington, DC 20460

Attention: Ms. Joanne Miller (PM #23)
 RE: Prodiamine Technical, EPA Reg. No. 83278-XXX
 Application for Pesticide Registration

Dear Ms. Miller:

The following documents are submitted in support of this application for a "Me-Too" product, old A.I.:

Volume 1 Administrative Materials
 - Application for Pesticide Registration; EPA Form 8570-1.
 - Data Matrix
 - EPA Confidential Statement of Formula (EPA Form 8570-4)
 - Five (5) copies of draft labeling.

3 copies of the following documents:

46872101 Volume 2 Product Identity and Composition of Prodiamine Technical; Selected Studies to Fulfill OPPTS Guideline Series 830 in Accordance With 40 CFR Part 158.155, 158.160, 158.162 and 158.167: Description of Materials Used to Produce the Product; Description of Production Process; and Discussion of Formation of Impurities
 OPPTS Guidelines 830.1550, 830.1600, 830.1620, and 830.1670

46872102 Volume 3 Determination of the Physical and Chemical Characteristics and Preliminary Analysis of Technical Prodiamine
 OPPTS Guidelines 830.1700, 830.1750, 830.1800, 830.6302, 830.6303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7200, 830.7300, 830.7550, 830.7840

Please be advised that this application is supported by the cite-all option in accordance with FIFRA 3(c)(1)(D). Letters of intent have been sent to all companies listed on the March 31, 2006 Data Submitters List indicating that Envanage, LLC has applied for the registration of Prodiamine Technical. Furthermore, Envanage, LLC is prepared to send offer to pay letters and submit its Certification with Respect to Citation of Data (EPA Form 8570-34) when the Agency notifies us that such a certification is required to issue a registration notice for this product.

This registration action will fall within the PRIA category as stated in Table 4 - Registration Division: New Products as published in the Wednesday March 17, 2004 Federal Register. This action is further defined under EPA No. R31; CR No. 86 as a "New Product" "Non-Fast Track". The PRIA fee for this registration action is therefore \$4,200 and the decision time frame is 6 months.

Should you have any questions or wish to reach me, please feel free to contact my office at (203) 740-1200.

Sincerely,


 Lawrence A. Miller



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 3, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

EVANAGE, LLC
115 OBTUSE HILL ROAD
BROOKFIELD, CT 06804-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 26-JUN-06. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

ENVANAGE, LLC

115 Obtuse Hill Road
Brookfield, CT 06804
Voice: 203-740-1600
Fax: 203-740-1220

June 23, 2006

Document Processing Desk
Office of Pesticide Programs (7504C)
US Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attention: Ms. Joanne Miller (PM #23)

RE: Prodiamine Technical, EPA Reg. No. 83278-XXX
Application for Pesticide Registration

Dear Ms. Miller:

The following documents are submitted in support of this application for a "Me-Too" product, old A.I.:

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· Data Matrix
· EPA Confidential Statement of Formula (EPA Form 8570-4)
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3 copies of the following documents:

Volume 2 Product Identity and Composition of Prodiamine Technical; Selected Studies to Fulfill OPPTS Guideline Series 830 in Accordance With 40 CFR Part 158.155, 158.160, 158.162 and 158.167; Description of Materials Used to Produce the Product; Description of Production Process; and Discussion of Formation of Impurities
OPPTS Guidelines 830.1550, 830.1600, 830.1620, and 830.1670

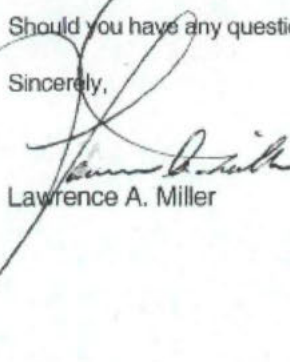
Volume 3 Determination of the Physical and Chemical Characteristics and Preliminary Analysis of Technical Prodiamine
OPPTS Guidelines 830.1700, 830.1750, 830.1800, 830.6302, 830.6303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7200, 830.7300, 830.7550, 830.7840

Please be advised that this application is supported by the cite-all option in accordance with FIFRA 3(c)(1)(D). Letters of intent have been sent to all companies listed on the March 31, 2006 Data Submitters List indicating that Envanage, LLC has applied for the registration of Prodiamine Technical. Furthermore, Envanage, LLC is prepared to send offer to pay letters and submit its Certification with Respect to Citation of Data (EPA Form 8570-34) when the Agency notifies us that such a certification is required to issue a registration notice for this product.

This registration action will fall within the PRIA category as stated in Table 4 - Registration Division: New Products as published in the Wednesday March 17, 2004 Federal Register. This action is further defined under EPA No. R31; CR No. 86 as a "New Product" "Non-Fast Track". The PRIA fee for this registration action is therefore \$4,200 and the decision time frame is 6 months.

Should you have any questions or wish to reach me, please feel free to contact my office at (203) 740-1200.

Sincerely,


Lawrence A. Miller



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

 401 M Street, S.W.
 WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.

Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Envenage, LLC, 115 Obtuse Hill Road, Brookfield, CT 06804 tel: (203) 740-1800	EPA Registration Number/File Symbol 83278-R1
Active Ingredient(s) and/or representative test compound(s) Proflaminate	Date January 3, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Domestic Outdoor, Terrestrial Non-Food	Product Name Proflaminate Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA, and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date January 3, 2007	Typed or Printed Name and Title Lawrence A. Miller, Consultant
---------------	-------------------------	---


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date June 23, 2006		EPA Reg. No./File Symbol 83278-XXX		Page 1 of 6	
Applicant's/Registrant's Name & Address		Product:			
Envange, LLC 115 Obtuse Hill Road Brookfield, CT 06804		Prodiamine Technical			
Ingredient Prodiamine					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830-1550	Product Identity and Composition		Envange, LLC	Own	
830.1600	Description of Materials Used to Produce the Product		Envange, LLC	Own	
830.1620	Description of Production Process		Envange, LLC	Own	
830-1650	Description of Formulation Process				1
830.1670	Discussion of Formation of Impurities		Envange, LLC	Own	
830-1700	Preliminary Analysis		Envange, LLC	Own	
830.1750	Certified Limits		Envange, LLC	Own	
830.1800	Enforcement Analytical Method		Envange, LLC	Own	
830.1900	Submittal of Samples				2
830.6302	Color		Envange, LLC	Own	
830.6303	Physical State		Envange, LLC	Own	
830.6304	Odor		Envange, LLC	Own	
830.6313	Stability to normal & elevated temp., metal, metal ion		Envange, LLC	Own	
830.6314	Oxidation/Reduction		Envange, LLC	Own	
830.6315	Flammability / Flame Extension				3
830.6316	Explosibility				4
Signature 			Name and Title		Date
			Lawrence A. Miller, Member		06/23/2006

Based on EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

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401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date June 23, 2006		EPA Reg. No./File Symbol 83278-XXX		Page 2 of 6	
Applicant's/Registrant's Name & Address		Product			
Envange, LLC 115 Obtuse Hill Road Brookfield, CT 06804		Prodiamine Technical			
Ingredient Prodiamine					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability				5
830.6319	Miscibility				6
830.6320	Corrosion Characteristics				7
830.6321	Dielectric Breakdown Voltage				8
830.7000	pH		Envange, LLC	Own	
830.7050	UV/Visible Spectrum		Envange, LLC	Own	
830.7100	Viscosity				9
830.7200	Melting Point/ Melting Range		Envange, LLC	Own	
830.7300	Density		Envange, LLC	Own	
830.7370	Dissociation Constant				10
830.7550	Partition Coefficient		Envange, LLC	Own	
830.7840	Water Solubility		Envange, LLC	Own	
830.7950	Vapor Pressure				11
Signature			Name and Title		Date
			Lawrence A. Miller, Member		06/23/2006

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DATA MATRIX

Date June 23, 2006		EPA Reg. No./File Symbol 83278-XXX		Page 3 of 6	
Applicant's/Registrant's Name & Address		Product:			
Envange, LLC 115 Obtuse Hill Road Brookfield, CT 06804		Prodiamine Technical			
Ingredient Prodiamine					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Syngenta Crop Protection	Pay	
			Greensboro, NC		
			Bayer Advanced	Pay	
			Research Triangle Park, NC		
			Helena Chemical Co.	Pay	
			Collierville, TN		
			J.R. Simplot	Pay	
			Lathrop, CA		
			Southern States Cooperative	Pay	
			Richmond, VA		
			Sunniland Corp	Pay	
			Miami, FL		
Signature	Name and Title			Date	
	Lawrence A. Miller, Member			06/23/2006	

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WASHINGTON, D.C. 20460

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DATA MATRIX

Date June 23, 2006		EPA Reg. No./File Symbol 83278-XXX		Page 4 of 6	
Applicant's/Registrant's Name & Address		Product			
Envange, LLC 115 Obtuse Hill Road Brookfield, CT 06804		Prodiamine Technical			
Ingredient Prodiamine					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		The Andersons	Pay	
			Maumee, OH		
			Makhteshim-Agan of North America	Pay	
			Raleigh, NC		
			Spray Drift Task Force	Pay	
			Washington, DC		
			Agro Distribution, LLC	Pay	
			St. Paul, MN		
			Howard Fertilizer & Chemical	Pay	
			Salem, VA		
			Micro-Flo Company LLC	Pay	
			Memphis, TN		
			Control Solutions, Inc.	Pay	
			Pasadena, TX		
			Outdoor Residential Exposure TF	Pay	
			Washington, DC		
Signature			Name and Title		Date
			Lawrence A. Miller, Member		06/23/2006

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DATA MATRIX

Date June 23, 2006		EPA Reg. No./File Symbol 83278-XXX		Page 5 of 6	
Applicant's/Registrant's Name & Address		Product			
Envange, LLC 115 Obtuse Hill Road Brookfield, CT 06804		Prodiamine Technical			
Ingredient Prodiamine					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Agricultural Reentry Task Force	Pay	
			Washington, DC		
			Tri Chem, Inc.	Pay	
			Memphis, TN		
			Quest Chemical Corp.	Pay	
			Houston, TX		
			Agricultural Handlers Exposure TF	Pay	
			Macon, MO		
			Sipcam Agro USA	Pay	
			Roswell, GA		
			Harrell's Inc.	Pay	
			Hilton Head Island, NC		
			Cedar Chemical Corp.	Pay	
			Memphis, TN		
			Nation's AG II	Pay	
			Seattle, WA		
Signature	Name and Title		Date		
	Lawrence A. Miller, Member		06/23/2006		

Based on EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

DATA MATRIX FOOTNOTES

1. **Description of Formulation Process:** Not applicable because the product is a TGAI/MP.
2. **Submittal of Samples:** Not required at this time.
3. **Flammability / Flame Extension:** Not applicable. Product is not combustible.
4. **Explodability:** Not applicable. Product is not potentially explosive.
5. **Storage Stability:** Will be submitted if required.
6. **Miscibility:** Not applicable. Product is not intended for dilution with petroleum solvents.
7. **Corrosion Characteristics:** Will be submitted if required.
8. **Dielectric Breakdown Voltage:** Not applicable. Product is not intended for use around electrical equipment.
9. **Viscosity:** Not required because product is a solid.
10. **Dissociation Constant:** Not required. The water solubility is so low that the product does not dissociate.
11. **Vapor Pressure:** Published literature indicates that the vapor pressure is below any of the guideline test methods. Therefore it is not possible to determine an accurate reading.

443

90.98.9

Prodiamine Technical

For the Manufacture of
Non-Food Use Granular Herbicides Only

Active Ingredient:

Prodiamine (CAS No. 2909-21-2).....97.5%

Related Compounds:.....2.5%

TOTAL.....100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If Swallowed:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on Skin or Clothing:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If in Eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
If Inhaled:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

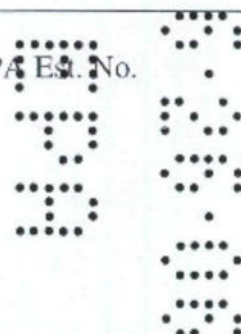
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

EPA Reg. No. 83278-XXX

Net Contents:

Manufactured by:
Envanage LLC
115 Obtuse Hill Road
Brookfield, CT 06804

EPA Est. No.



PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing dust. Avoid contact with skin, eyes, or clothing.

ENVIRONMENTAL HAZARDS

This product has a low solubility in water. At the limit of solubility, this product is not toxic to fish. However, at concentrations above the level of water solubility, it may be toxic to fish.

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is to be used ONLY FOR FORMULATION INTO GRANULAR HERBICIDES for the following use(s):

1. Established turfgrasses, lawns and sod nurseries;
2. Landscape ornamentals in nurseries or in established plantings;
3. Established perennials and wildflower plantings;
4. Plants grown for cut foliage production;
5. Conifer and hardwood tree seedling nurseries;
6. Christmas tree farms;
7. Managed transportation and utility rights-of-way, including rail and equipment yards, and public utility facilities (substations, tank farms, pumping stations, parking/storage areas, ungrazed fencerows).

This product is a technical active ingredient intended to be used only in the manufacture of registered non-crop end-use products. Each formulator is responsible for obtaining the EPA registration for their formula(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in original container away from fertilizer, feed, or food stuffs and separate from other pesticides.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of at an approved waste disposal facility.

Container Disposal: Plastic Containers – Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or at an incineration facility, or, if allowed by state and local authorities, by burning locally. If burned, stay out of smoke.

Paper and Plastic Containers – Completely empty container into application equipment. Then dispose of empty container in a sanitary landfill or at an incineration facility. Completely empty

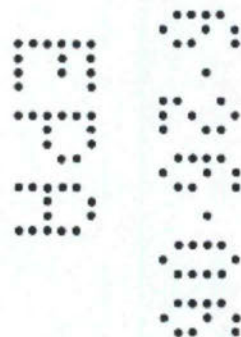
container into formulation equipment. Then dispose of empty container in a sanitary landfill or, if allowed by state and local authorities, by burning locally. If burned, stay out of smoke.

Fiber Drums – Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residues into application equipment. Dispose of empty liner in a sanitary landfill or at an incineration facility if allowed by state and local authorities. If the drum cannot be reused, dispose of in a sanitary landfill or by incineration if allowed by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

ENVANAGE, LLC warrants that this product conforms to the chemical description and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or ENVANAGE, and Buyer and User assume the risk of any such use. ENVANAGE, LLC MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

In no case shall ENVANAGE, LLC be liable for incidental, consequential, or special damages resulting from the use or handling of this product. The exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.



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